# IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF MISSISSIPPI OXFORD DIVISION

THOMAS KEATHLEY AND CONNIE KEATHLEY,

Plaintiffs,

v.

No. 3:21cv261-MPM-RP JURY DEMANDED

BUDDY AYERS CONSTRUCTION, INC., AND DAVID FOWLER. INDIVIDUALLY, AND AS AN EMPLOYEE, AGENT, AND/OR SERVANT OF BUDDY AYERS CONSTRUCTION, INC.,

Defendants.

## PLAINTIFF CONNIE KEATHLEY'S STIPULATION OF VOLUNTARY DISMISSAL WITHOUT PREJUDICE

COMES NOW Plaintiff Connie Keathley, only, by and through counsel, pursuant to Rule 41(a)(1)(ii) of the Federal Rules of Civil Procedure, and announces to the Court that Plaintiff Connie Keathley's claims may be dismissed without prejudice.

Respectfully submitted,

**BAILEY & GREER, PLLC** 

/s/ Thomas R. Greer Thomas R. Greer (#105164) Bailey & Greer, PLLC 6256 Poplar Avenue Memphis, TN 38119 Phone: (901) 680-9777 Fax: (901) 680-0580

E: tgreer@baileygreer.com

### /s/ Arnold U. Luciano

Arnold U. Luciano
Bethany A. Tarpley
Jack Griffith Luciano, P.A.
150 Sharpe Avenue
P O Box 1209
Cleveland, MS 38732
E: aluciano@jlpalaw.com
E: aluciano@jlpalaw.com
Counsel for David Fowler

### /s/ Dana Dearman

Claude O'Donnell, Jr. Dana Dearman, Jr. Clayton O'Donnell, PLLC. 115 North Broadway Tupelo, MS 38802

E: cclayton@claytonodonnell.com E: ddearman@claytonodonnell.com Counsel for Ayers Construction

### **CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing was served upon the following by electronic mail on Friday, October 7, 2022.

Arnold U. Luciano
Bethany A. Tarpley
Jack Griffith Luciano, P.A.
150 Sharpe Avenue
P O Box 1209
Cleveland, MS 38732
Email: aluciano@jlpalaw.com

Email: aluciano@jlpalaw.com Email: aluciano@jlpalaw.com Counsel for David Fowler

Claude O'Donnell, Jr.
Dana Dearman, Jr.
Clayton O'Donnell, PLLC.
115 North Broadway
Tupelo, MS 38802

Email: cclayton@claytonodonnell.com Email: ddearman@claytonodonnell.com

Counsel for Ayers Construction

/s/ Thomas R. Greer Thomas R. Greer (#105164)